

Dear Sir/Madam

To: manstonairport@planninginspectorate.gov.uk

For the attention of the Manston Airport Case Team

Regarding the communication from the Department for Transport of 11th June 2021, relating to the re-determination of the application by Riveroak Strategic Partners for an Order granting Development Consent, Manston Airport, Kent.

As Interested Parties we wish to make the following submission.

The Planning Inspectorate determined, after a lengthy and detailed consultation process, that the Need for the proposed application was not founded. Independent aviation experts at the time referenced the steady decline in pure air freight demand, and the Department of Transport's own declining projections of future pure air freight requirements. The enquiry also found evidence of excess capacity at the major air freight hubs located much closer to centres of demand than is Manston. Since the date of the Planning Inspectorate's conclusion that the DCO should not be awarded, much has happened, all of it weakening any case for Need. Indeed the Secretary of State's own decision letter overturning the PINS conclusions was completely devoid of any evidence of Need, suggesting that even he could not produce an argument in favour of his decision.

The Covid pandemic has had a significant impact on passenger air travel. Although the eventual ending of travel restrictions is expected to see passenger levels returning towards pre-pandemic levels there is evidence that many passengers will restrict their air travel due to ongoing fears about infection spread in very enclosed spaces. In particular there is expected to be a significant fall in business travel as companies assess the cost/benefit relationship having experienced successful communication without face-to-face meeting. The whole direction of remote business communication is increasingly likely to be technology-based rather than requiring far more expensive (in financial cost and time) air travel. Major air operators will increasingly have spare airframe capacity and reduced income shifting their business model away from passengers towards freight. Not only is there no Need for Manston, there is no desire within the freight industry to move away from established hubs and relocate to a more expensive, geographically distant and sparsely populated location.

The main argument against need, notwithstanding the long-term effects of Covid, is Climate Change. Air freight is simply the most carbon-intensive form of transport by several orders of magnitude, and one that, as all expert bodies agree, needs to be curtailed significantly to have any hope of achieving our climate goals. Carbon pricing will increase the cost of air freight relative to other transport and reduce demand in the short term. Longer term technical improvements to aircraft, fuel and more efficient routing will all help contribute to reduced carbon emissions but most are a long way into the future, especially for price-sensitive cargo transport, and action is needed now. These measures do not, in any shape or form, add any weight to the failing argument for developing Manston Airport. Indeed the Committee for Climate Change, in its December 2020 report, stated that to meet climate targets, there should be no more than "a 25% growth [in aviation demand] ... without any net increase in UK airport capacity, so that any expansion is balanced by reductions in capacity elsewhere in the UK". UK FIRES (the government-funded academic body "Locating Resource Efficiencies at the heart of Future Industrial Strategy") stated in their 2019 assessment entitled Absolute Zero: "Aviation: There are

no options for zero-emissions flight in the time available for action, so the industry faces a rapid contraction. Developments in electric flight may be relevant beyond 2050.”

Another perceived need is for increased employment in the Thanet area. Thanet is a particularly deprived region, suffering from high unemployment and a shortage of job opportunities. Redevelopment of Manston does not address that need. Indeed the Planning Inspectorate concluded that the small number of new jobs generated by the airport would not make up for the fall in employment opportunities caused by the damage to Thanet's burgeoning tourist and hospitality industries. Post Covid the increase in 'staycation' holidays will add further jobs that will be threatened by any airport development. As a fully automated cargo hub (in the words of Riveroak Strategic Partners) the local employment opportunities will be minimal, and no sleight of hand (for instance including in job counts fruit pickers in Africa) will improve that. What is required for the region are forward looking, sustainable employment opportunities, particularly in the renewable energy sectors. Thanet has significant Solar PV and wind farm energy production. Local councils and central government should be encouraging the development of industries around this production; both manufacturing and engineering support for the wind and solar industries, but also allied industries such as renewable hydrogen production, battery production, low-energy heating solutions, insulation and all the other in-demand industries needed to transition to a low carbon economy. A forward looking council and local MPs would see the development of yet another doomed-to-fail polluting airport as a catastrophic waste of a prime brownfield site for industry and the housing and infrastructure to support it. By focusing on yesterday's technology they prove themselves unfit for the modern age, wedded to the dinosaur past that will die out as surely as the age of the horse. The government's own "Ten Point Plan for a Green Industrial Revolution", updated November 2020, stresses the importance of focusing on "Building back better, supporting green jobs, and accelerating our path to net zero". This plan is completely incompatible with the redevelopment of Manston as an air freight hub.

In summary this DCO proposal provides no evidence of need, no evidence of benefit to the local region, and considerable evidence of harm and wasted opportunity. A government allied to the prospect of an advancing Britain, leading the way in carbon footprint reduction and sustainable technologies would not consider this proposal in any shape or form. That the Secretary of State, already having one failed attempt to overthrow the considerations of a number of experts over a significant period of time, should make a second attempt, would illustrate the contempt for facts and the hollowness of aspirations of this government.

Dr Philip and Mrs Deborah Shotton
Ramsgate Residents and Interested Parties

For full and detailed references see the government's own (and government supported) papers:

UK Parliament POST: POSTNOTE Number 615 February 2020

Committee on Climate Change: The Sixth Carbon Budget, The UK's path to Net Zero December 2020

Department for Business, Energy and Industrial Strategy, The Prime Minister's Office, 10

Downing Street: The Ten Point Plan for a Green Industrial Revolution,

<https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/titl>
e

UK FIRES: <https://ukfires.org/>